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UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Division of
Marketing Practices

Mary S. Feinstein
Attorney

Direct Dial:
(202) 326-3064

August 15, 1995

Scott R. McCray
General Counsel
Vanguard America Co
P.O. Box 10223
Raleigh, NC 27605-0223

Re: Vanguard's Trust 100 Marketing Program

Dear Mr. McCray:

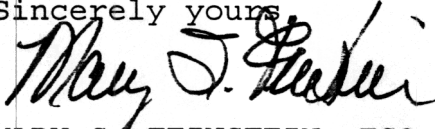
This letter is in response to your letter of July 24, 1995 about Vanguard's Trust 100 Marketing Program. I hope that this letter provides an answer to the question you posed.

1. May your company, acting as a sales agent for several funeral providers, use one generic general price list ("GPL") in the sale of funeral goods and services?

If your company is acting as an agent for funeral providers, and is offering for sale funeral goods and services, it must provide a GPL (and other price lists to the extent that they are required) that meets the Funeral Rule's requirements. Each funeral provider who agrees to be bound by the prices on such GPL should list its name, address and telephone number on the GPL even if one GPL is used. See 16 C.F.R. § 453.2(b)(4)(i)(C). As noted in your letter, consumers must be allowed to itemize the funeral goods and services selected.

I hope that this resolves this question. Please be advised that the views expressed here are those of FTC staff. They have not been reviewed, approved or adopted by the Commission, and they are not binding upon the Commission. However, they do reflect the opinion of those staff charged with enforcement of the Funeral Rule.

Sincerely yours


MARY S. FEINSTEIN, ESQ